

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,
Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a
Washington Public Corporation; ELIZA
SAUNDERS, Director of the Office of
Public Records, in her personal and official
capacity; ALISON SWENSON, Compliance
Analyst, in her personal capacity; PERRY
TAPPER, Public Records Compliance
Officer, in his personal capacity; ANDREW
PALMER, Compliance Analyst, in his
personal capacity; JOHN or JANES DOES
1-12, in his or her personal capacity,
Defendants.

No. 2:17-cv-00642-MJP

DECLARATION OF DEREK C. CHEN
IN SUPPORT OF DEFENDANTS'
MOTION FOR A PROTECTIVE
ORDER

NOTE ON MOTION CALENDER:
November 2, 2018

I, Derek C. Chen, declare as follows:

1. I am one of the attorneys representing the Defendant in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. On October 23, 2018, I emailed Plaintiff's counsel Joseph Thomas to request a stay of Plaintiff's Second Set of Discovery Requests, or, in the alternative, a meet and confer conference regarding his discovery requests. *Exh. B.* Mr. Thomas responded the next day, stating he had no availability for the entire week. I offered two full days of availability to Mr. Thomas.

1 3. The following exhibits are cited or relied upon in Defendants' Motion for a
2 Protective Order:

3 A. Attached as **Exhibit A** is a true and correct copy of "Plaintiff's
4 Second Set of Discovery Requests" to Defendants in this case.

5 B. Attached as **Exhibit B** is a true and correct copy of email
6 correspondence between myself and Plaintiff's counsel Joseph Thomas regarding
7 my request to meet and confer on this issue.

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9 I declare under penalty of perjury under the laws of the State of Washington that the
10 foregoing is true and correct to the best of my knowledge.

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12 DATED this 25th day of October, 2018, at Seattle, Washington.

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14 /s/ Derek C. Chen

15 Derek C. Chen, WSBA #49723
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CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiff

Mr. Joseph Thomas
14625 SE 176th Street, Apt. N-101
Renton, WA 98058-8994
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DATED: October 25, 2018

/s/ Derek C. Chen

Derek C. Chen, WSBA #49723
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